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To: <2022190174@fec.gov>  
cc:

Subject: FEC Form 9 Filing

To Whom It May Concern:

Attached, please find AARP's FEC Form 9 "24 Hour Notice of Disbursements/Obligations for Electioneering Communications" regarding an advertising flight that first aired on September 8, 2008. AARP filed a previous FEC Form 9 to disclose the initial flight of the electioneering communications at issue (the "AARP EC") on July 26, 2008, as amended on August 21, 2008.

AARP recognizes, and alerts the Commission voluntarily and promptly after discovery, that it is filing the attached FEC Form 9 three days after the date required by Section 104.20(b) of the Commission's Rules. AARP is committed to full compliance with all relevant law and regulations and, accordingly, has taken corrective action to prevent recurrence of this inadvertent oversight.

AARP's late filing results from communication errors between AARP personnel responsible for advertising, compliance staff, and its advertising vendor, GSDM Idea City ("GSDM"). AARP's contractual arrangement with GSDM covers a wide variety of advertising activities; the AARP EC represents only a small portion of the cable and television airtime inventory AARP has purchased through GSDM. On September 5, 2008, AARP advertising personnel instructed GSDM to replace one AARP advertising spot with the AARP EC on September 8, 2008, until a new advertisement is ready for broadcast.

On the evening of September 11, 2008, GSDM provided AARP with this new AARP EC flight's airtime cost. The AARP Office of General Counsel ("OGC") promptly implemented an internal review, which resulted in identifying September 8, 2008 as the date of public distribution. The OGC review yielded an action plan to prevent such miscommunications and filing errors in the future. OGC has obtained AARP executive support for implementing these corrective actions and will conduct more detailed briefings for AARP executives early in the week of September 15, 2008. Specific corrective actions include:

- (A) Requiring AARP advertising personnel to obtain written approval by one or more specifically-identified AARP Executive Vice Presidents before instructing vendors or expending funds to produce or distribute electioneering communications;
- (B) Requiring the approving AARP Executive Vice President to provide OGC with at least 24 hours' notice in advance of any such instruction, contract, obligation, or distribution; and,
- (C) Providing additional electioneering communications compliance training to the AARP Executive Vice Presidents designated as electioneering communication approvers and AARP advertising personnel.

AARP has reported this potential violation promptly and voluntarily,

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